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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

10 [REDACTED]

11
12 Petitioner,

13 vs.

14 JONATHAN REES, a.k.a. JONNY REES, a.k.a.
GREG ELLIS,

15 Respondent.
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Case No. 22STRO06738

DECLARATION OF KEVIN BERMAN

DECLARATION OF KEVIN BERMAN

I, Kevin Berman, declare that:

1. I am an employee of Berman and Ely, a California corporation engaged in the business of providing threat assessment, security and investigative services. I have been a licensed private investigator in the State of California for more than thirty-five years. Prior to that time, I served for thirteen years as a sworn peace officer in the Torrance Police Department, in Torrance, California.

2. I have known respondent, Jonny Rees, also known as Greg Ellis (the "Respondent") since approximately 2015. I first met him when Berman and Ely was hired to provide security for his then wife, now ex-wife, Dana Rees. When Dana Rees filed for divorce and sought domestic violence restraining orders against the Respondent in the Los Angeles Superior Court, my firm, Berman and Ely, was involved in having him personally served with documents related to case no. BQ048172. I also provided testimony in the Rees' divorce case, which was case no. BD617933.

3. On or about Saturday, March 21, 2015, I arranged for the Respondent to be served with domestic violence restraining order papers in the case that had been filed by Ms. Rees. The actual service was accomplished by Luis Flores, who works for Berman and Ely. I had Mr. Flores meet me at Dana Rees' home to pick up the papers, and deliver them to the Respondent in Covina, California, where he was being released from a facility. I no longer have a copy of the proof of service in that action, but am informed and believe that it was in case no. BQ048172 and that the person who physically served the papers was Luis Flores.

4. Even after I had arranged for the Respondent to be personally served with papers in the case filed by Dana Rees, he continued to stay in touch with me, via telephone calls and text messages.

5. In or about 2016, Mr. Rees introduced me to the petitioner in this case, [REDACTED]. The reason for the introduction is that a security company that had been hired to work at one of Ms. [REDACTED]'s wedding venues in El Segundo, California, did not show up for the wedding, Ms. [REDACTED] hired Berman and Ely to provide security at that event, as well as subsequent events.

1 6. During the time that Berman and Ely was working for Ms. [REDACTED]'s businesses and
2 venues in El Segundo, I had many conversations with the Respondent. Between mid-May 2017 and
3 the beginning of October 2017, these conversations occurred primarily at Ms. [REDACTED]'s home in El
4 Segundo, California, which she had been sharing with the Respondent at that time.

5 7. In approximately September or October 2017, Ms. [REDACTED] called me and told me
6 that she was afraid of the Respondent and concerned for her personal safety. She wanted him out of
7 her house and asked me to help. I told her that I would speak with the Respondent and try to help
8 arrange for him to move out. I was at the Petitioner's home while the Respondent packed various
9 items and left. It was at that time, in the beginning of October 2017, that I referred the Petitioner to
10 Jeffrey Rosenfeld at Blank Rome, and told her that he could assist Ms. [REDACTED] if she needed to
11 take legal action against Mr. Rees.

12 8. I kept in touch with both Ms. [REDACTED] and with the Respondent even after
13 facilitating the Respondent's removal from Ms. [REDACTED]'s home. I believe that I have a good
14 relationship with both of them. I have been told that the Respondent wrote a book called "*The*
15 *Respondent*," in which he details a prior litigation in which a domestic violence restraining order was
16 issued against him, and that he refers to me in that book as "The Facilitator," although I have never
17 read the book.

18 9. In October 2022, Ms. [REDACTED] contacted me and told me that she needed my help
19 with the Respondent again.

20 10. After Ms. [REDACTED] obtained domestic violence temporary restraining orders against
21 the Respondent, I was asked by Jeffrey Rosenfeld at Blank Rome to attempt to serve Respondent
22 with the Court papers. I agreed to try to serve Mr. Rees and made several attempts. Those attempts
23 included the following:

24 a. On October 19, 2022, at approximately 6:00 p.m., an associate and I attempted
25 service on Mr. Rees at 4821 Inglewood Boulevard in Culver City, California. Mr.
26 Rees did not appear to be at the premises.

27 b. On October 20, 2022, I went to the same premises in Culver City three times to
28 attempt service on Mr. Rees. While I was there, I observed, and video recorded, a

1 United States Postal Service employee delivering mail to 4821 Inglewood
2 Boulevard in Culver City. She placed several items in between the slats of the
3 fence next to the sidewalk in front of the house, in plain view. Those items were
4 not in a mailbox or container of any kind. I looked at the items and saw a letter
5 addressed to the Respondent from the Los Angeles County Registrar/Recorder. I
6 took a picture of the letter with my iPhone. A copy of that picture, along with the
7 metadata showing the time and date taken, is attached hereto as **Exhibit 1**.
8 Attached as **Exhibit 2** is another picture that I took outside of Mr. Rees' home at
9 that time.

- 10 c. On October 21, 2022, Mr. Rees posted on his Instagram site @realgregellis a
11 picture of the Paramount Studios lot, and wrote that he was there. At
12 approximately 3:15 p.m. that day, I attempted service on Mr. Rees at 4821
13 Inglewood Boulevard in Culver City, California. Mr. Rees did not appear to be at
14 the premises.
- 15 d. Later, on October 21, 2022, Mr. Rees posted on his Instagram site @realgregellis
16 that he was "Staying at the Chateau Marmont, feeling blessed and so grateful." A
17 copy of that posting is attached hereto as **Exhibit 3**.
- 18 e. On October 22, 2022, I went to the Chateau Marmont to attempt service on Rees.
19 I was there from approximately 1:00 p.m. until 7:00 p.m., after which I checked
20 the house at 4821 Inglewood Boulevard in Culver City, and then returned to the
21 Chateau Marmont from 9:00 p.m. until 11:00 p.m. I did not see the Respondent at
22 either location. I showed employees of the Chateau Marmont the picture that he
23 had posted, and they told me that was an old stock photograph and that the dining
24 room had not been set up as it appeared in the photo since before the COVID-19
25 pandemic.

26 11. On October 22, 2022, at 9:33 p.m., I sent a text message to the Respondent, asking if
27 he was around to talk. He responded and said that he was available. Respondent called me at 11:27
28 p.m. The call lasted one hour and fifty-five minutes. During the call, I told the Respondent that I was

1 attempting to serve him with a court order and papers on behalf of Ms. [REDACTED]. He asked what it
2 was relating to, and I told him that it had to do with the fact that he had sent revenge porn and threats
3 related to Ms. [REDACTED] to other people. He readily admitted that he had sent pornographic images
4 and threatening emails, and informed me that he had also spoken with his manager or agent, who
5 had told Respondent to destroy and erase all of it. During the conversation, he told me words to the
6 effect that “he couldn’t deal with this,” that he would “kill himself,” and that this would be “the end
7 of his life.” Over the course of the next hour and forty-five minutes of this call, I felt that he was
8 spinning out of control. However, I felt that by the end of the call, he had calmed a bit, and had
9 indicated a willingness to accept the service of the papers on the following day. He told me that he
10 did not want to be served at his home, that he had seen a female try to serve him there previously,
11 and that she had the papers in her hand and that she was recording it with a cell phone around her
12 neck. I told him that I would arrange to have the person with the paperwork meet him anywhere he
13 wanted to meet that made him feel comfortable. Additionally, he asked me if he needed an attorney.
14 I told him that if he felt he needed an attorney he should get one.

15 12. On October 23, 2022, at 1:19 p.m., I received another call from Mr. Rees. That call
16 lasted one hour and two minutes. During that call, Mr. Rees told me words to the effect that his life
17 was over, that another restraining order was going to ruin him, and that he was going to commit
18 suicide. I stayed on the phone with him and tried to talk him down. I was concerned that his threats
19 to kill himself were real, because I know him and had every reason to believe that what he was
20 telling me was true. I was aware that he had been hospitalized in the past, including when I had him
21 served with a domestic violence restraining order for Dana Rees back in 2015.

22 13. I stayed in contact with Mr. Rees by text message, and, for a while, he responded to
23 me. Then, after he failed to respond to me on October 24, 2022, I became concerned that he may
24 have followed through with his previous statements to harm himself.

25 14. On October 24, 2022, I spoke with Mr. Rosenfeld. He told me that he was going to
26 inquire with the sheriff’s department in Chenango County, New York to see whether they had a civil
27 service division, who could attempt service on the Respondent at that location. I asked Mr.
28 Rosenfeld if I could be on the call with him, because I was concerned that the Respondent may have

1 harmed himself. I then told Mr. Rosenfeld about my calls with the Respondent, and that I wanted to
2 inform the sheriff about my concerns and request a welfare check.

3 15. Mr. Rosenfeld and I called the sheriff's department together. Mr. Rosenfeld first
4 spoke with Mr. Craig Allison in the civil service unit, and requested assistance in serving the
5 domestic violence restraining orders on the Respondent. I told Mr. Allison that I was concerned for
6 the Respondent's safety based on conversations that I had with him. Mr. Allison informed us that his
7 department could take care of the service of process, and told me that I should speak with a detective
8 about my conversation with the Respondent. We were then transferred a couple of times, and
9 eventually spoke with Detective Jeffrey Barton.

10 16. When we were initially connected to Detective Barton, Mr. Rosenfeld introduced
11 himself and stated that he is an attorney in California who represents Ms. [REDACTED] and that she is
12 the petitioner and protected party in a domestic violence restraining order action pending in
13 California. Mr. Rosenfeld explained that he had obtained a temporary restraining order and notice of
14 court hearing on Ms. [REDACTED]'s behalf that was against Mr. Rees, based on evidence that Mr. Rees
15 had sent revenge porn and other harassing emails to and about Ms. [REDACTED]. Mr. Rosenfeld said
16 that he was asking the civil service division to serve those papers on Mr. Rees, and that I (Mr.
17 Berman) wanted to speak to the detective about my conversations with Mr. Rees.

18 17. I introduced myself to Detective Barton as a licensed private investigator in
19 California and a former police officer. I explained that I had a long history with Mr. Rees, had
20 spoken to Mr. Rees many times over the years, that I had been attempting to serve Mr. Rees with the
21 restraining order in California, and that I had also spoken with him for hours on the telephone over
22 the previous two days. I then relayed to Detective Barton the conversation that I had with Mr. Rees
23 in which he threatened to commit suicide, as well as the fact that Mr. Rees had later stopped
24 responding to me. I requested that Detective Barton send someone to check on Mr. Rees's welfare.

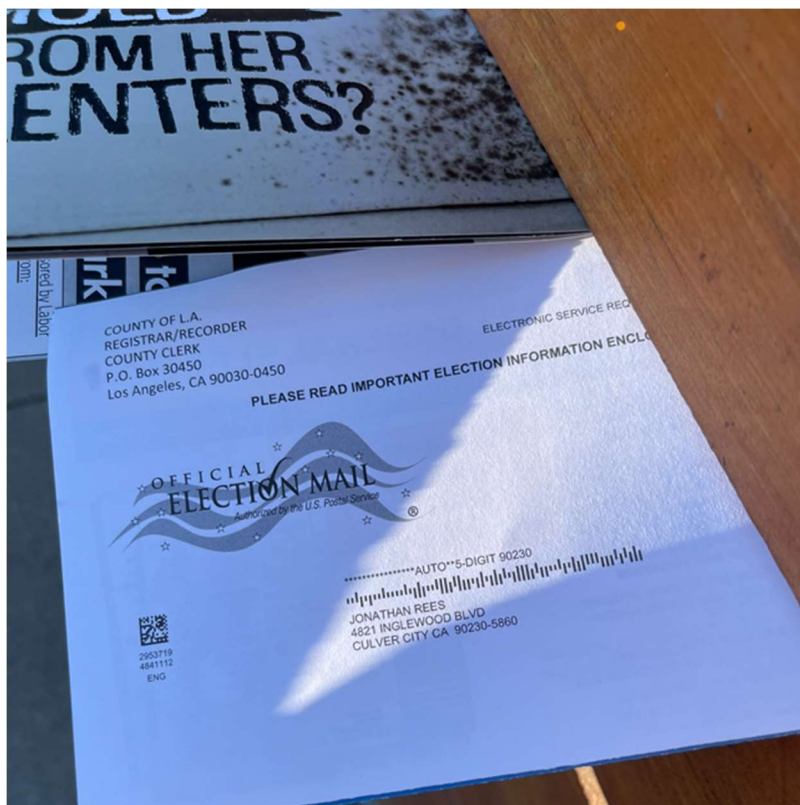
25 18. On November 4, 2022, Mr. Rees sent me a link to a story on social media, in which
26 he had claimed that Mr. Rosenfeld supposedly told the sheriff that he represented Mr. Rees. The
27 story was false. I was present for the entire call with the sheriff's office, and Mr. Rosenfeld never
28 told anyone that he represented Mr. Rees. As noted, Mr. Rosenfeld stated clearly that he represented

1 Ms. [REDACTED] the victim in this matter. I responded to Mr. Rees' text message, and told him, among
2 other things "what you have put in print that you sent me is very wrong." I also let him know that it
3 was me who had asked the sheriff's department to check on his welfare. Attached as **Exhibit 4** is a
4 copy of the text correspondence that the Respondent and I had on that day.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct. Executed on November 12, 2022.

7
8 
9 Kevin Berman

EXHIBIT 1



Add a Caption

 **Look Up** – Book >

Thursday • Oct 20, 2022 •
4:33 PM

[Adjust](#)

 IMG_0850

Apple iPhone 12 Pro Max

HEIF

Wide Camera — 26 mm $f1.6$
12 MP · 3024 × 4032 · 1.7 MB

ISO32 | 26mm | 0 ev | $f1.6$ | 1/1130s

[Add a location...](#)



EXHIBIT 2

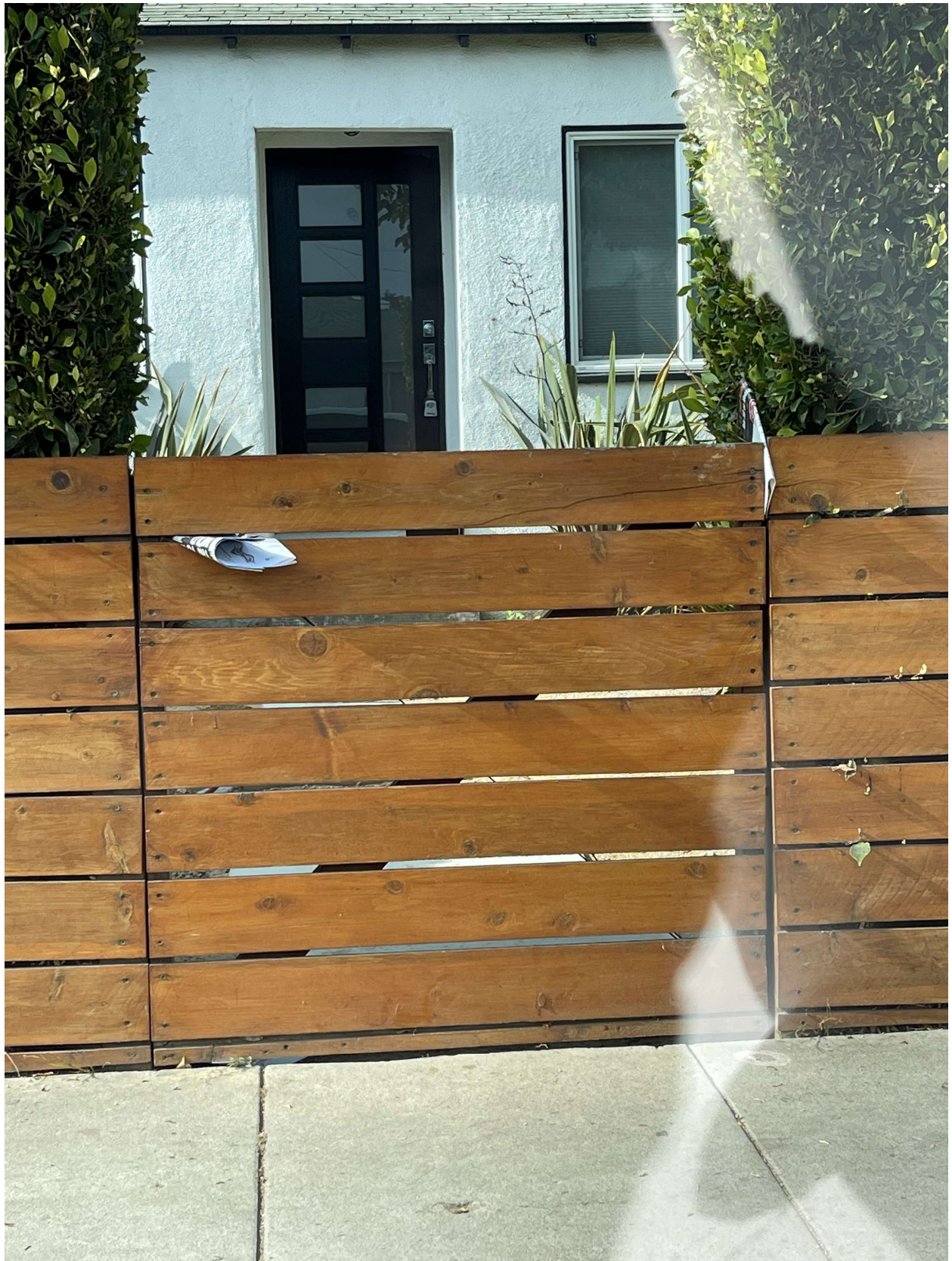


EXHIBIT 3

10:47 🌙

◀ Search



REALGREGELLIS
Posts

Follow



realgregellis 🔵



37 likes

realgregellis Staying at the Chateau
Marmont, feeling blessed and so grateful.

View all 2 comments

1 hour ago



realgregellis 🔵



EXHIBIT 4

6:12



**Attorney Jeff Rosenfeld
Calls 911 FAKING
Suicide of PIRATES Star
Greg Ellis** >
youtube.com

So this is interesting
however totally false.
Maybe if you had spoken to
me you would know what
really happened .

However as usual, you
think you can gain some
advantage with
misinformation, and in this
instance you are totally



iMessage



6:12



However as usual, you think you can gain some advantage with misinformation, and in this instance you are totally wrong.

It's unfortunate that you can't take responsibility for your actions.

As I told you when we spoke I was trying to get you to deal with this before you cut off your nose to spite your face.

It appears that once again, you have removed your nose.

Im glad you are ok, that's all I asked the officers to do was check on your welfare,



iMessage



6:13



Im glad you are ok, that's all I asked the officers to do was check on your welfare, based upon our conversations.

You see the call to the sheriff and the discussion I had is all on tape at the sheriffs department. The notes you have are inaccurate even though you got them from the officers, that's on them but now you really know .

I suggest for your best interest that you investigate a little more before you defame the wrong person and add more bad stuff to the litany of your life



iMessage



6:13



conversations.

You see the call to the sheriff and the discussion I had is all on tape at the sheriffs department. The notes you have are inaccurate even though you got them from the officers, that's on them but now you really know .

I suggest for your best interest that you investigate a little more before you defame the wrong person and add more bad stuff to the litany of your life

I feel really bad for you, I'm praying for you, and you know how to reach me.



iMessage



6:20



GE



Greg >

I don't need to investigate this matter, that's a job for the police - report is filed against Jeff Rosenfeld - calling in a fake police report is a class D felony in New York. Are you saying that you called in and impersonated Attorney Jeff Rosenfeld?

All I'm saying is it's all on tape at the police department and I am the one who called it in and gave them my name, there is no crime there was no false report, I told them what you told me and that's why I asked them to check on your welfare.

Like in our phone calls your spinning way out of control



iMessage



6:20



GE
Greg >



Like in our phone calls your spinning way out of control

And this stuff you sent me is totally false, and it's foolish.

Lastly, the one thing you know is I don't lie, and I tried to do you a solid.

Just sorry that everything in your world is so out of control

You know I'm here for you brother.

The press has the 911 dispatch call.

If the press has the phone call made to the sheriffs office dispatcher it is clearly me giving my name



iMessage



6:20



If the press has the phone call made to the sheriffs office dispatcher it is clearly me giving my name and giving them the information, and asking them to check on your welfare.

That's it, there is nothing more, there is nothing nefarious, I asked them to check on you. No one else.

The press also have the wiretapping information and the audio tape of the knife attack from your client "The Copycat." I saw a headline "Psycho Ex-Celebrity Photographer who Sold Photos of Britney



iMessage



6:20



GE



Greg >

The press also have the wiretapping information and the audio tape of the knife attack from your client "The Copycat." I saw a headline "Psycho Ex-Celebrity Photographer who Sold Photos of Britney Spears Kids, Wiretapped Pirates of the Caribbean Star, Watching him for 6 months, Ordered to be Restrained" in New York.

This is getting out of control brother.

The only one out of control here brother is you and what you call your board of directors of your charity

You placed these stories no one else, you continued to



iMessage



6:21



The only one out of control here brother is you and what you call your board of directors of your charity

You placed these stories no one else, you continued to do exactly what you said you would do and that is ruin your ex.

You sent the revenge porn and the threats, I know you well enough to know this is you doing everything wrong in some weak attempt to make yourself the victim.

Be that as it may I don't think I can help you fix this. And it is obvious that you have a different agenda then anyone else



iMessage



6:21



GE
Greg >



Just be careful, because what you have put in print that you sent me is very wrong.

It could create even larger problems for you and that would be a shame

Stay safe brother, again I'm praying that you get some clarity.

I agree with you brother, the headline is shocking.

Did I mention I am writing my sequel, "The Petitioner."

You just did

Hope it's not followed by



iMessage



6:21



Greg

I agree with you brother,
the headline is shocking.

Did I mention I am writing
my sequel, "The Petitioner."

You just did

Hope it's not followed by
the inmate, the prequel. Lol

Delivered

The inmate in my book is
called "The Copycat" Who
knew watching someone
for six months on video
without their knowledge or
consent is a felony in all 50
States. Orange is the new
black.



iMessage

